

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

The State of Missouri, *et al.*,

Plaintiffs,

v.

President Joseph R. Biden, Jr., in his official
capacity as President of the United States of
America, *et. al.*,

Defendants.

Civil Action No. 22-cv-1213

**JOINT MOTION FOR 2-DAY EXTENSION OF TIME
TO SUBMIT JOINT STATEMENT**

The parties jointly move for a two-day extension to have until 3:00 PM Central on August 31, 2022, to file their joint statement outlining any disputes concerning Plaintiffs' written discovery. On August 17, 2022, Defendants served objections and responses to Plaintiffs' written discovery requests, and commenced a rolling production of documents that will be completed today, August 26, 2022. The parties are currently engaging in a productive meet-and-confer process in advance of submitting a joint statement to the Court detailing any outstanding discovery disputes. Pursuant to the Court's order, ECF No. 34, the parties have ten days from August 17, until Monday, August 29, to meet and confer and submit the joint statement. In light of the already productive discussions between the parties, and in efforts to continue to streamline the issues in dispute in advance of submitting the joint statement, the parties respectfully request a modest extension of two days—until Wednesday, August 31, at 3:00 pm Central—for the deadline to submit their joint statement. The additional time will also permit the parties to meet and confer about any issues that may arise from the completion of Defendants' rolling production of

documents, which they anticipate completing today. Other than this two-day extension, the parties do not request any change to the ensuing deadlines set forth in the Court's discovery order, Doc. 34, at 12-14.

Dated: August 26, 2022

Respectfully submitted,

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*** application for admission forthcoming